

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim
Plaintiffs.

Civil Action No. 05-292 (JJF)

DECLARATION OF SCOTT H. HOLMBERG

I, Scott Holmberg, declare under penalty of perjury as follows:

1. I have personal knowledge of the facts stated in this declaration, and if called upon as a witness, I could competently testify to the facts stated herein.

2. I am 62 years of age, and I am a resident of the state of California, residing at 3106 Las Palmas Avenue, Escondido, CA 92025.

3. I received a Bachelor of Science in the field of Electrical Engineering from Wayne State University, and I have over thirty (30) years of engineering and management experience in the semiconductor and electronic display industry, including the design and development of one of the world's first fully functional Active Matrix Liquid Crystal Displays ("AMLCD") in 1982.

4. I am the inventor of U.S. Patent No. 5,019,002 (“the ‘002 Patent”), entitled “Method of Manufacturing Flat Panel Backplanes Including Electrostatic Discharge Prevention and Displays Made Thereby,” which relates to methods to protect the circuit elements of liquid crystal display panels (“LCD panels”) from damage caused by electrostatic discharge that is accidentally fed into the active matrix.

5. Since December 2005, I have been assisting counsel for LG.Philips LCD Co., Ltd. (“LPL”) as an expert consultant, and I have agreed to assist, advise, and consult with LPL’s counsel regarding the ‘002 Patent, including regarding technical issues related to the invention and claims in the ‘002 Patent.

6. This is the second time I have acted as an expert consultant. The previous instance, in connection with *LG.Philips Co., Ltd. v. NEC Corporation, et al.*, C.A. No. 99-726 (RRM), also involved the ‘002 Patent.

7. An attorney from the law firm of Howrey LLP contacted me in December 2005 and asked whether I would serve as Defendants’ consultant in this case. As I had already been retained by LPL, I declined Howrey’s invitation.

8. I have reviewed and agreed to be bound by the terms and provisions of the “CONFIDENTIALITY STIPULATION AND PROTECTIVE ORDER” entered by this Court on January 24, 2006. Attached as Exhibit 1 to this Declaration is a copy of my “Acknowledgement,” which I signed on February 21, 2006.

9. As required by Section 1(a) of the Protective Order, I agree not to use any information that I receive in this case, which is subject to and governed by the Protective Order, except in connection with my work on this case.

10. I am not presently, nor have I ever been, an employee of any party to this case.

11. I am neither a patent agent nor a patent attorney, and I am not presently substantively involved in, and do not anticipate being substantively involved in, drafting, filing, or prosecuting any patent applications, selecting or identifying the subject matter of any patent claims, or preparing or drafting any patent claims, or providing instruction, direction, or advice regarding these prosecution related activities, where the application or claims are directed to (a) the manufacture and/or structure of thin film transistors and/or associated wiring structures (for liquid crystal display devices) of the type disclosed in the patents-in-suit in *LG.Philips LCD Co., Ltd. v. Tatung Co. of America, et al.*, Consolidated Cases CV 02-6775 CBM (JTLx), CV 03-2866 CBM (JTLx), CV 03-2884 CBM (JTLx), CV 03-2885 CBM (JTLx), CV 03-2886 CBM (JTLx) (C.D. Cal.), (b) tape carrier packages in liquid crystal display devices, or (c) products or methods directed to protecting against electrostatic discharge in the thin film transistor substrate of liquid crystal display devices.

12. I have never consulted or worked for any of the parties to this case in any competitive decision-making process.

13. Since 1998, I have been the President, Chief Executive Officer, sole shareholder, and one of the two employees of LightSmith, Inc.

14. I do not consider myself to be a competitor of the Defendants.

15. Throughout the industry, virtually all AMLCD panels used in LCD computer monitors and LCD televisions are amorphous silicon based. Likewise, it is my understanding that Defendants' AMLCD display products, including its AMLCD panels used in LCD computer monitors and LCD televisions, are amorphous silicon based. Since 1997, I have not participated in designing, manufacturing, advertising, promoting, or selling amorphous silicon based AMLCD display products.

16. Although I have been involved in the semiconductor and LCD industries for many years, I have not since 1997 worked for or provided business related consulting services to any company that manufactures or distributes amorphous silicon based AMLCD display products, including LPL.

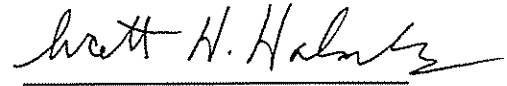
17. From 1998 through 2005, my research was focused on inventing and seeking patent protection for both (a) methods of fabricating polycrystalline silicon ("polysilicon") circuits on plastic substrates and (b) equipment to dry etch ITO films. Neither of these areas of research involve either tape carrier packages or inventions to prevent electrostatic discharge in amorphous silicon based AMLCD display products.

18. I am not currently pursuing any specific areas of research. Instead, I am presently focused on business concerns involving my past inventions

(specifically the aforementioned work in the areas of fabricating polysilicon circuits on plastic substrates and equipment to dry etch ITO films) and providing consulting services regarding the validity and infringement of my patents.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 15, 2006 at Escondido, CA.



Scott H. Holmberg

Exhibit 1

ACKNOWLEDGEMENT

I, SCOTT H. HOLMBERG, declare:

1. I reside at 3106 LAS PALMAS AVE. [Street Address]
ESCONDIDO, CA 92025 [City, State, Zip code].

2. I am employed by LIGHTSMITH, INC. [Employer] located at
3106 LAS PALMAS AVE. [Street Address]
ESCONDIDO, CA 92025 [City, State, Zip code] as
PRESIDENT [Position or Title].

3. I have read and understand the provisions of the Confidentiality Stipulation and Protective Order ("Protective Order") entered in the U.S. District Court for the District of Delaware ("the Court") with respect to the non-disclosure of CONFIDENTIAL and CONFIDENTIAL ATTORNEYS ONLY information and/or documents, and I agree to abide by and be bound by its terms. Specifically, and without limitation upon such terms, I agree not to use or disclose any confidential information made available to me other than in accordance with the Protective Order.

4. I hereby submit to the jurisdiction of the Court for the limited purpose of enforcing the Protective Order, and this Acknowledgement, by contempt proceedings or other appropriate judicial remedies.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Acknowledgement was executed this 21st day of FEBRUARY, 2006

By: Scott H. Holmberg

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on March 17, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.
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The undersigned counsel further certifies that copies of the foregoing document were sent by email and hand to the above counsel and by email and first class mail to the following non-registered participants:

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/s/ Richard D. Kirk (rk0922)
Richard D. Kirk